



**U.S. Department of Justice**

*United States Attorney  
Eastern District of New York*

DMP/NJM  
F. #2015R01787

*271 Cadman Plaza East  
Brooklyn, New York 11201*

July 31, 2018

By FedEx and ECF

Robert J. Cleary, Esq.  
Dietrich L. Snell, Esq.  
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Proskauer Rose LLP  
Eleven Times Square  
New York, NY 10036

Re: United States v. Dan Zhong and Landong Wang  
Criminal Docket No. 16-614 (DLI)

Dear Counsel:

Pursuant to Rule 16 of the Federal Rules of Criminal Procedure, the government hereby furnishes discovery with respect to the above-referenced matter, the contents of which have been designated "Sensitive Discovery Material" under the terms of the Protective Order dated February 22, 2017 (Dkt. No. 37) (the "February 22 Order"). This disclosure supplements the government's earlier disclosures under cover of letters dated February 15, May 22, May 24, June 12, July 12, July 24, August 30, October 24, December 1, December 8, December 14, December 17, and December 22, 2017, and January 15, January 18, January 19, February 2, February 7, February 15, May 11 and May 24, 2018. The government renews its request for reciprocal discovery from the defendant.

Enclosed is an encrypted CD containing the following:

- Pursuant to your request dated June 28, 2018, a copy of the fifth worker's PRC passport, referenced in Paragraph 30 of the Complaint, bearing Bates numbers DZ066902-DZ066905, which has been designated "Sensitive Discovery Material" under the February 22 Order;
- Diplomatic Notes exchanged between the United States Department of State and the Embassy of the People's Republic of China between

January 2010 and November 2015, bearing Bates numbers DZ066906-DZ066933, which have been designated “Sensitive Discovery Material” under the February 22 Order;

- Materials received from the Bank of China, bearing Bates numbers DZ066934-DZ067155, which have been designated “Sensitive Discovery Materials” under the February 22 Order;
- Electronically stored information obtained from a search of email accounts, bearing Bates numbers ESI 40834 – ESI 44512, which has been designated “Sensitive Discovery Material” under the February 22 Order; and
- Pursuant to your request dated June 28, 2018, the email and attached proposal concerning contracting at the Old Brookville Residence, referenced in Paragraph 24 of the Complaint, bearing Bates numbers ESI 44513 – ESI 44517, which have been designated “Sensitive Discovery Material” under the February 22 Order.

If you have any questions or requests regarding further discovery, please do not hesitate to contact me.

Very truly yours,

RICHARD P. DONOGHUE  
United States Attorney

By: /s/ Douglas M. Pravda  
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Douglas M. Pravda  
Ian C. Richardson  
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Enclosures (DZ066902-DZ067155)  
(ESI00040834-ESI00044517)

cc: Clerk of the Court (DLI) (by ECF) (without enclosures)